

1 Honorable James L. Robart
2
3
4
5
6
7
8
9

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 Jemal Hussen TURA, an individual, and
11 Damtew Assefa WOLDEGIORGIS, an
12 individual,

Plaintiffs,

13 NO. C19-1131 JLR
14 SECOND STIPULATION AND
15 ~~PROPOSED~~ ORDER TO EXTEND
16 RESPONSE DEADLINE

17
18 v
19 UNITED STATES DEPARTMENT OF
20 HOMELAND SECURITY (“DHS”), *et al.*,

21 Defendants.

22
23 Noting Date: September 23, 2019

24
25
26
27
28 **Stipulation**

The parties have conferred and stipulate and agree as follows. By Stipulated Order dated September 17, 2019, the Court extended by 60 days until December 2, 2019 the deadline by which Defendants would file their response to Plaintiffs’ complaint. *See Order*, Dkt. No. 6. For the reasons set forth in that prior stipulated order, the parties herein respectfully request that all deadlines as set forth in the Court’s Order dated August 18, 2019 be stayed at least until December 2, 2019. If necessary, the parties shall thereafter file by December 9, 2019 a proposed schedule setting forth suggested initial scheduling dates.

Respectfully submitted and presented this 23rd day of September, 2019.

BRIAN T. MORAN
United States Attorney

/s/ Jay W. Gairson

JAY W. GAIRSON, WSBA #43365
Gairson Law,LLC
4606 Martin Luther King Jr. Way S.
Seattle, WA 98108
206-357-4218
Email: jay@gairson.com

/s/ Patricia D. Gugin

Patricia D. Gugin, WSBA # 43458
Assistant United States Attorney
United States Attorney's Office
1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: 253-428-3832
Fax: 253-428-3826

Attorney for Plaintiffs

E-mail: pat.gugin@usdoj.gov

Attorneys for Defendants

**SECOND STIPULATION AND PROPOSED ORDER TO EXTEND
RESPONSE DEADLINE- 2
No. C19-1131 JLR**

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

Order

2 It is so ORDERED. All deadlines set forth in the Court's Scheduling Order dated
3 August 19, 2019, Dkt. No. 4, are hereby stayed. If necessary, the parties shall submit by
4 December 9, 2019 a proposed scheduling order setting forth suggested initial scheduling
5 dates.

September 30, 2019

James L. Robart
United States District Judge

SECOND STIPULATION AND PROPOSED ORDER TO EXTEND
RESPONSE DEADLINE- 3
No. C19-1131 JLR

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he/she is an employee/contractor in the Office of the United States Attorney for the Western District of Washington and is a person of such age and discretion as to be competent to serve papers.

It is further certified that, on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participant(s):

Jay Gairson
Email: jay@gairson.com

I further certify that on this date, I mailed by United States Postal Service the foregoing to the following non-CM/ECF participant(s)/CM/ECF participant(s), addressed as follows:

-0-

DATED this 23rd day of September, 2019

s/ Rebecca L. Clauson
REBECCA L. CLAUSON
Legal Assistant
United States Attorney's Office
1201 Pacific Ave., Ste. 700
Tacoma, WA 98402
Phone: 253-428-3800
Fax: 253-428-3826
E-mail: rebecca.clauson@usdoj.gov